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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JPMORGAN CHASE BANK, N.A., a
national banking association,

Plaintiff,
vs.

SFR INVESTMENTS POOL 1, LLC, a Nevada limited liability company; THE WILLOWS HOMEOWNERS' ASSOCIATION, a Nevada non-profit corporation; DANIEL A. RICHARD, an individual,

20 Defendants.

Case No. 2:17-CV-00324-GMN-PAL

**STIPULATION AND ORDER TO
AMEND SCHEDULING ORDER TO
EXTEND DISPOSITIVE MOTIONS
DEADLINE AND ALLOW FOR LATE
DEPOSITION**

(Third Request)

21 SFR INVESTMENTS POOL 1, LLC, a
22 Nevada limited liability company,

23 Counterclaimant/Cross-Claimant,

24 | vs.

25 JPMORGAN CHASE BANK, N.A.;
DANIEL A. RICHARD, an individual,

Counter-Defendant/Cross-Defendants.

1 Pursuant to LR IA 6-1, LR 26-4 and Fed. R. Civ. P. Rule 29, Plaintiff/Counter-
2 Defendant/Cross-Defendant JPMORGAN CHASE BANK N.A. (“Chase”),
3 Defendant/Counterclaimant/Cross-Claimant SFR INVESTMENTS POOL 1, LLC.
4 (“SFR”), and Defendant THE WILLOWS HOMEOWNERS’ ASSOCIATION (the
5 “Willows”), (collectively, the “Parties”), by and through their respective counsel of
6 record, stipulate and request that this Court extend the dispositive motion deadline
7 in the above-captioned case as well as authorize a limited extension of time to permit
8 the Parties to complete discovery and take the deposition of the Willow's designee
9 after the discovery cutoff date of March 5, 2018. The Willow's designee has been ill
10 and will not be available until after discovery in this matter has closed. The Parties
11 agree that permitting the deposition to occur after the close of discovery is the most
12 reasonable way to complete the deposition, including providing the Willow's
13 designated witness sufficient time to recuperate and prepare for the deposition.

14 The dispositive motions deadline is presently set for April 5, 2018 [ECF No.
15 53]. The Parties propose a limited two (2) week extension of time to allow the Parties
16 to take the deposition of the Willow's designee. The proposed dispositive motions
17 deadline is April 19, 2018.

18 This is the Parties' third request for an extension to the scheduling order
19 deadlines, which were submitted in compliance with LR 26-1. The Parties make this
20 request in good faith and not for purposes of delay.

21 | A. Discovery Completed to Date

22 Discovery is complete, with the exception of the deposition of the Willow's
23 designated witness.

24 To date, Chase has served the following discovery: initial disclosures; initial
25 expert disclosure; requests for production to SFR; interrogatories to SFR; notice of
26 Rule 30(b)(6) deposition of SFR; requests for production to Willows; interrogatories to
27 Willows; notice of Rule 30(b)(6) deposition of Willows; subpoena to produce
28 documents on non-party Absolute Collection Services, LLC; and subpoena to testify

1 at a deposition on non-party Absolute Collection Services, LLC. Chase has also
2 responded to SFR's and Willows' requests for production, requests for admission, and
3 interrogatories to Chase.

4 To date, SFR has served the following discovery: initial disclosures; requests
5 for production to Chase; interrogatories to Chase; requests for admission to Chase;
6 and notice of Rule 30(b)(6) deposition of Chase. SFR has also responded to Chase's
7 requests for production and interrogatories to SFR.

8 To date Willows has served the following discovery: requests for production to
9 Chase; interrogatories to Chase; and requests for admission to Chase. The Willows
10 has also responded to Chase's Requests for Production and Interrogatories to
11 Willows.

12 **B. Specific Description of Discovery that Remains to be Completed**

13 Discovery is complete, with the exception of the deposition of the Willow's
14 designated witness.

15 **C. Good Cause Exists for the Requested Extension**

16 A limited-purpose extension of the discovery deadlines is merited under LR 26-
17 4. The Parties have been diligently prosecuting this case. All discovery is complete
18 except for the deposition of the Willow's designated witness. The Parties are only
19 requesting extensions of the dispositive motion deadline and seek authorization from
20 the Court to allow the Parties to take the deposition of the Willow's designee outside
21 of the discovery deadline. The Parties ask the Court to extend the dispositive
22 motions deadline by two (2) weeks and seek this extension in good faith.

23 **D. Proposed Discovery Deadlines**

24 The parties request an order extending the deadline to file dispositive motions
25 by two (2) weeks.

Event	Current Deadline ¹	New Deadline
Close of Discovery	March 5, 2018	
Dispositive Motions	April 5, 2018	April 19, 2018
Pre-Trial Order	May 2, 2018	

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¹ See Scheduling Order, ECF No. 53.

1 This extension is reasonable and necessary given the good cause set forth
2 above and is not done for the purposes of delay.

3 **IT IS SO STIPULATED.**

4 Dated: March 5, 2018

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1 **IT IS SO ORDERED:**

2 
3 UNITED STATES MAGISTRATE JUDGE

4 DATED: March 7, 2018